

EXHIBIT 1

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SUMMARY OF DATA BREACH SETTLEMENTS

Case	Class Members	Monetary Value	Non-Monetary Relief	Fees/Costs	Class Representative Service Award
<i>In re Target Corporation Customer Data Security Breach Litig.</i> , MDL No. 14-2522 (PAM/JJK) (Settlement of Consumer Plaintiffs' claims. Financial Institution Plaintiffs' claims unaffected by Settlement.)	110 million	Settlement fund: \$10 million (all cash, no coupons or vouchers) <ul style="list-style-type: none"> \$10 million into escrow account to pay approved class rep awards, documented loss claims (up to \$10,000 per claim including 2 hours at \$10/hr. of lost time by consumer dealing with particular types of loss (e.g., unauthorized charges, replacement of driver's license, etc.). Documentary Support Claims to include documentation that claimed losses were incurred and more likely than not arose from the data breach; reasonable documentation includes credit card statements, invoices, receipts. Documented support claims reimbursed up to \$10,000, with minimum payment equal to equal share amount to be paid to Self-Certification claimants. 	For period of five years, Target shall: <ul style="list-style-type: none"> designate high level chief information security office to take responsibility for information security program entrusted with protection of consumers' personally identifiable information; maintain written information security program – Target will identify internal and external risks to security of consumers' personally identifiable information and periodically review sufficiency of safeguards to control such risks, develop security metrics measuring its security program and ensure metrics periodically reviewed and approved by senior Target leadership; maintain process to monitor for information security events and respond to threats – Target to design and 	Agreement by Target to pay attorneys' fees and expenses awarded by the Court, up to \$6.75 million combined fees and expenses.	Consumer Plaintiffs will request awards of up to \$500 each to most class representatives, and \$1,000 each to three class representatives who were deposed.

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		<ul style="list-style-type: none"> Self-Certification Claims do not require documentary evidence of losses; eligible if claimant used a payment card at a U.S. Target store during breach period, 11/27/2013-12/18/2013, and/or received notice or otherwise believes personal information was compromised as a result of the data breach; Self-Certification claimants entitled to receive equal shares of the amount remaining in Settlement Fund after payment of approved Documentary Support Claims and class representative service awards approved by Court – benefit amount determined by dividing the amount remaining in the Settlement Fund by the total number of valid Self-Certification Claims. Distribution plan provides for claim validation process and criteria and dispute resolution process for Documentary Support Claims. No reversion—no part of the 	<p>implement reasonable safeguards to control information security risks including through reasonable software security testing;</p> <ul style="list-style-type: none"> Target to educate and train relevant employees of importance of security of consumers' personal identifying information. 		

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		<p>Settlement Fund reverts back to Target</p> <ul style="list-style-type: none"> Target to pay, separate and in addition to the Settlement fund, costs of administration, class notice costs and attorney fees and expenses awarded by the Court. 			
<p><i>In re: Heartland Payment Systems, Inc. Customer Data Security Breach Litig.</i>, 4:09-MD-2046 (S.D. Tex.) (Consumer Track)</p>	130 million	<p>Settlement fund: \$1 million (with agreement to contribute additional \$1.4 million if needed).</p> <ul style="list-style-type: none"> \$1 million settlement fund for payment of: <ul style="list-style-type: none"> →up to \$175 in reimbursement for out-of-pocket expenses or reasonable time expended (up to \$50) for card cancellation/replacement, unauthorized charges, or identity theft losses, with documentation; claimant must demonstrate any expenses or lost time were more likely than not caused by the data breach. →up to \$10,000 in reimbursement for identity theft related charges (other 	<p>Defendant to report to plaintiffs' expert re remedial measures taken or planned to advance security of computer system and minimize likelihood of future breaches; plaintiffs' counsel can accept or reject (settlement conditioned on plaintiffs' acceptance of report).</p>	<p>Court approved \$606,192 in fees and \$35,000 in costs</p>	<p>Court denied awards.</p>

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		<p>than on the card compromised in the data breach) and losses caused by identity theft; claimant must demonstrate losses more likely than not caused by the data breach.</p> <ul style="list-style-type: none"> Heartland to pay additional \$1.4 million into settlement fund if necessary to pay valid claims. Remainder of original \$1 million to be paid to <i>cy pres</i> recipients if fund balance remains after paying claims; additional \$1.4 million funds not subject to <i>cy pres</i> and revert to Heartland if not used to pay claims. 			
<i>Lim v. Vendini, Inc.</i> , 1-14-CV-259897 (Cal. Sup. Ct. 2014) (case involved unauthorized access by third party to event, marketing and ticketing company's customers'	3 million	<p>Settlement fund: \$3 million.</p> <ul style="list-style-type: none"> \$3 million settlement fund for payment of claims, attorney fees, notice and administration costs, and class representative awards. Class members with unreimbursed identity theft losses eligible for reimbursement up to \$3,000 if 	None.	Up to \$900,000 (30% of settlement fund) in fees; up to \$25,000 in costs.	\$2,500 service award to each named plaintiff.

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personal identification information).		<p>they can show losses more likely than not resulted from breach and provide documentation.</p> <ul style="list-style-type: none"> Class members with other out-of-pocket losses eligible for reimbursement up to \$1,000 if they can show losses more likely than not resulted from the breach. Various types of out-of-pocket expenses subject to various caps ranging from \$20 to up to \$50. 			
<i>In re Countrywide Fin. Corp. Customer Data Security Breach Litig.</i> , 3:08-MD-01998-TBR (W.D. Ky. 2009) (case involved theft by Countrywide employee and sale of Countrywide's customers' private information to third-parties).	Estimated 17,204,393	<p>Claims made settlement: \$6.5 million cap.</p> <ul style="list-style-type: none"> Up to \$50,000 per incident of identity theft losses shown by claimant to be more likely than not the result of the alleged theft of private information; documentation required; payment subject to overall \$5 million cap. Available identity theft insurance, including that offered as part of settlement, must be exhausted before identity theft claim is paid. 	2 years credit monitoring (plus credit insurance for consumers who accepted defendant's initial offer of credit monitoring).	\$3.5 million fees and \$100,000 costs (separate from settlement fund).	\$500 for representative plaintiffs; \$250 for named plaintiffs (separate from settlement fund).

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		<ul style="list-style-type: none"> Reimbursement for: (i) check printing costs of up to \$90 required by opening of new bank account; (ii) up to \$200 in costs to obtain credit monitoring and identity theft insurance before start of credit monitoring package offered by Countrywide; (iii) up to \$60 in other out-of-pocket costs; (iv) costs of replacing driver's license. Documentation required. Overall cap of \$1.5 million on claims. 			
<i>In re TJX Companies Retail Security Breach Litig.</i> , 07-10162 (D. Mass. 2007)	Estimated 45.7 million	<p>Claims made settlement: \$10 million fund (combined voucher and cash alternative fund) and \$7 million capped fund for payment of documented claims.</p> <ul style="list-style-type: none"> \$15 check or \$30 store voucher for class members who certify they made a purchase at TJX and spent more than \$5 or 30 minutes as a result of the data breach; subject to \$10 million cap with checks and vouchers credited as \$30 against cap. Additional \$15 check or \$30 	3 years credit monitoring and identity theft insurance (2 years of credit monitoring for customers who accepted previous credit monitoring offer).	Up to \$6.5 million in fees and up to \$150,000 in costs and expenses (separate from settlement fund).	None.

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		<p>voucher for documented claims; \$7 million cap on checks; no cap on vouchers.</p> <ul style="list-style-type: none"> • Reimbursement of driver's license replacement cost for claimants who submit documentation of having replaced their driver's license due to breach. • Reimbursement of unreimbursed losses greater than \$60 resulting from identity theft for class members whose social security number is same as driver's license, military, tax or state identification number. Subject to \$1 million cap. • If valid claims exceed caps, amount of each benefit will be proportionately reduced. 			
<i>McGann v. Schnuck Markets, Inc.</i> , No. 1322-CC00800 (Mo. Cir. Ct., City of St. Louis)	2.4 million	<p>Claims made settlement: \$2.1 million cap.</p> <ul style="list-style-type: none"> • Defendant to pay up to \$1.6 million for payment of the following claims: <p>→Up to \$175 per class</p>	None.	Court approved \$635,000 fees and \$10,061 in costs (separate from settlement fund).	\$500 per class rep. (separate from settlement fund).

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		<p>member for certain unreimbursed out-of-pocket and lost time expenses; reasonable documentation required.</p> <p>→\$10 payment for fraudulent charge, if supported by account statement showing fraudulent charge and reimbursement or reversal.</p> <ul style="list-style-type: none"> Defendant may apply costs of notice and claims administration toward the \$1.6 million cap once approved claims are paid. Up to \$10,000 for identity theft losses if proven more likely than not to have resulted from the breach; documentation in form of police report related to the identity theft required; and class members must have exhausted all applicable insurance policies; subject to \$300,000 cap. 			
<i>In re Michaels Stores Pin Pad</i>	95,000	Settlement Fund: \$600,000 (Defendant to contribute	One year credit monitoring offered to class members; two	\$1.2 million fees and \$55,565 costs (separate	\$2,500 per class rep.

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<i>Litig.</i> , No. 1:11-cv-03350 (N.D. Ill.)		<p>additional \$200,000, if needed).</p> <ul style="list-style-type: none"> \$600,000 settlement fund for payment of unreimbursed claims, credit monitoring, administrative and notice costs, incentive awards, and litigation costs and expenses (limited to maximum of \$100,000). If fund is exhausted, Defendant to increase fund up by additional \$200,000. 	years for class members with unauthorized charges.	from settlement fund).	
<i>Curry v. AvMed, Inc.</i> , 10-cv-24513-JLK (S. D. Fla. 2013)	460,000	<p>Settlement Fund of \$3 million (for payment of claims, notice and administrative expenses, attorney fees and class representative awards).</p> <ul style="list-style-type: none"> \$250,000 allocated to pay documented claims from customers whose personal information was contained on stolen laptops and who suffered documented monetary loss attributable to the data breach. \$10 per year, \$30 max per class member who paid for insurance prior to data breach and whose personal 	Defendant to provide training to company employees on laptop security, upgrade company laptops and revise company procedures to enhance information security.	\$750,000 in attorney fees (paid from settlement fund).	\$5,000 to class representative (paid from settlement fund).

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		<p>information was contained on the stolen laptops.</p> <ul style="list-style-type: none"> All unclaimed funds revert to Defendant. 			
<i>Burrows v. Purchasing Power, LLC</i> , 1:12-cv-22800-UNGARO (S. D. Fla. 2013)	43,565	<p>\$225,000 settlement to pay following claims of class members:</p> <ul style="list-style-type: none"> Class members who can demonstrate they were victims of tax refund fraud may claim compensation for actual damages plus 8% interest up to \$500 per claim. Up to \$100 per class member for payment of a fee to a tax preparer to assist in resolving issues relating to tax fraud. Up to \$500 per class member who can demonstrate that they were victims of identity theft (other than tax refund fraud) or compensation for credit card charges attributable to the theft. To the extent claims exceed \$225,000 settlement fund, benefit to each class member 	Defendant must designate employee responsible for security program; perform risk assessment identifying internal and external risks to security of personal data; design and implement reasonable safeguards to control the risks identified; use reasonable steps to select service provider capable of maintaining appropriate security practices; and notify customers of data the company possesses and how it uses such information.	Court approved \$200,000 in fees and \$12,423 in costs.	\$3500 to class representative

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		<p>reduced on pro-rata basis.</p> <ul style="list-style-type: none"> Unclaimed funds revert to Defendant. 			
<i>In re Sony Gaming Networks and Consumer Data Security Breach Litig.</i> , 11-MD-2258 AJB (S.D. Cal. 2014)	Estimated 24.6 million (per Sony in announcing breach) of estimated 77 million online gaming network users	<p>Claims made settlement: \$1 million cash reimbursement cap plus \$14 million non-cash benefit cap plus additional uncapped benefits.</p> <ul style="list-style-type: none"> Payment of up to \$2,500 for class members with unreimbursed identity theft related charges (other than on the card accessed in the data breach), upon showing that charges more likely than not to have resulted from the breach. Total reimbursement capped at \$1 million. Class members with \$2 or more of credits in their Sony account at time of breach eligible to receive payment equal to any unused funds in their account. Class members in two subclasses eligible to receive free games or other network benefits, deemed to be worth 	None.	Up to \$2.75 million total fees and costs.	None.

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		<p>estimated \$9. One subclass is capped at \$6 million and the other at \$4 million, payable on first-come, first-serve basis, with subsequent claimants able to receive alternative network benefit.</p> <ul style="list-style-type: none"> • Additional subclass is eligible to receive one month of free music service (valued at \$4.99). • Class members in another subclass eligible to receive \$4.50 in gaming credit. Total reimbursement for this category capped at \$4 million. 			
<i>In re Department of Veterans Affairs (VA) Data Theft Litig.</i> , 06-0506 (JR) (D.D.C. 2009)	26.5 million	<p>Settlement fund: \$20 million (for payment of claims, attorney fees, costs and expenses).</p> <ul style="list-style-type: none"> • Up to \$1,500 per class member, with minimum payment of \$750 per class member, or reimbursement of actual expenses attributable to the data breach. Claim documentation required. • Any remaining settlement 	None.	Court approved \$3.6 million in fees and \$157,076 in costs. (Both payable from settlement fund).	\$18,000 to be distributed between 9 named plaintiffs.

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		fund amounts to be paid to <i>cy pres</i> beneficiaries.			
<i>In re LinkedIn User Privacy Litig.</i> , No. 12-cv-03088 (N.D. Cal.)	800,000	Settlement fund: \$1.25 million. <ul style="list-style-type: none"> \$1.25 million paid into escrow to pay expenses, incentive awards and claims. Up to \$50 per claim to any class member affirming that his decision to purchase LinkedIn services was influenced by LinkedIn statements about security protocols. Parties to meet with mediator to revise payment plan if pro rata shares are less than \$10. Unused remainder in settlement fund to be paid to <i>cy pres</i> recipients. 	Defendant to employ additional encryption on passwords for five years.	Up to \$416,666 total fees and costs (1/3 of settlement fund).	Up to \$7,500 for single class representative.